

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 4/7/2025

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
- v. -	:	CONSENT PRELIMINARY ORDER OF FORFEITURE/ <u>MONEY JUDGMENT</u>
MEHRDAD MAHDAVOODI NOORZADEH,	:	
Defendant.	:	S2 21 Cr. 224 (VEC)
	:	
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WHEREAS, on or about December 20, 2024, MEHRDAD MAHDAVOODI NOORZADEH (the “Defendant”), was charged in a one-count Superseding Information, S2 21 Cr. 224 (VEC) (the “Information”), with submission of false export information, in violation of Title 13, United States Code, Section 305(a)(1), and Title 18, United States Code, Section 2 (Count One);

WHEREAS, the Information included a forfeiture allegation as to Count One of the Information, seeking forfeiture to the United States, pursuant to Title 13, United States Code, Section 305(a)(3), of: (a) any interest in, security of, claim against, or property or contractual rights of any kind in the goods or tangible items that are the subject of the violations charged in Count One of the Information, (b) any interest in, security of, claim against, or property or contractual rights of any kind in tangible property that was used in the export or attempted export that is the subject of the violations charged in Count One of the Information, and (c) any property constituting, or derived from, any proceeds obtained directly or indirectly as a result of the commission of the violations charged in Count One of the Information, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense charged in Count One of the Information;

WHEREAS, on or about December 20, 2024, the Defendant pled guilty to Count One of the Information, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Count One of the Information and agreed to forfeit to the United States, pursuant to Title 13, United States Code, Section 305(a)(3)(C), a sum of money equal to \$353,470 in United States currency, representing proceeds obtained directly or indirectly as a result of the offense alleged in Count One of the Information;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$353,470 in United States currency, representing the amount of proceeds traceable to the offense charged in Count One of the Information that the Defendant personally obtained, for which the Defendant is jointly and severally liable with his co-defendant, Michael Rose (the “Co-defendant”), to the extent a forfeiture money judgment is entered against the co-defendant in this case; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offense charged in Count One of the Information that the Defendant personally obtained cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Matthew Podolsky, Acting United States Attorney, Assistant United States Attorney Jane Chong, of counsel, and the Defendant and his counsel, Ricardo Solano Jr., Esq., and Justin M. Silverberg, Esq., that:

1. As a result of the offense charged in Count One of the Information, to which the Defendant pled guilty, a money judgment in the amount of \$353,470 in United States currency (the “Money Judgment”), representing the amount of proceeds traceable to the offense charged in Count One of the Information that the Defendant personally obtained, for which the Defendant is

jointly and severally liable with his Co-defendant, to the extent a forfeiture money judgment is entered against the Co-defendant in this case, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant MEHRDAD MAHDAVOODI NOORZADEH, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Marshals Service, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Illicit Finance and Money Laundering Unit, 26 Federal Plaza, 38th Floor, New York, New York 10278 and shall indicate the Defendant's name and case number.

4. The United States Marshals Service is authorized to deposit the payments on the Money Judgment into the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.


7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

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8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.


AGREED AND CONSENTED TO:

Matthew Podolsky
Acting United States Attorney for the
Southern District of New York

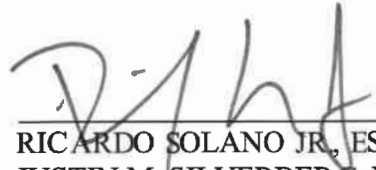
By: 
JANE CHONG
Assistant United States Attorney
26 Federal Plaza
New York, NY 10278
(212) 637-2263

3/30/2025
DATE

MEHRDAD MAHDAVOODI NOORZADEH


By: 
MEHRDAD MAHDAVOODI NOORZADEH

1 April 2025
DATE

By: 
RICARDO SOLANO JR., ESQ.
JUSTIN M. SILVERBERG, ESQ.
Attorneys for Defendant
One Gateway Center
Newark, NJ 07102-5310

4/1/25
DATE

SO ORDERED:


HONORABLE VALERIE E. CAPRONI
UNITED STATES DISTRICT JUDGE

April 7, 2025
DATE